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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

CARLIE SHERMAN, ANNA GOZUN;
AMANDA NASH; and **JOHN DOE** on behalf
of themselves and all similarly situated persons,

Plaintiff,

vs.

TRINITY TEEN SOLUTIONS, INC., a
Wyoming corporation; **TRIANGLE CROSS**
RANCH, LLC, a Wyoming limited liability
corporation; **MONKS OF THE MOST**
BLESSED VIRGIN MARY OF MOUNT
CARMEL, d/b/a MYSTIC MONK
COFFEE, a Wyoming corporation;
GERALD E. SCHNEIDER;
MICHAEELEN P. SCHNEIDER;
ANGELA C. WOODWARD; JERRY D.
WOODWARD; DANIEL SCHNEIDER;
MATHEW SCHNEIDER; MARK
SCHNEIDER; KARA WOODWARD;
KYLE WOODWARD; THOMAS GEORGE;
JUDITH D. JEFFERIS; DALLY-UP, LLC,
a Wyoming limited liability corporation;
ROCK CREEK RANCH, INC., a Delaware
corporation; **DIOCESE OF CHEYENNE,** a
Wyoming corporation; and the
SOCIETY OF OUR LADY OF THE MOST
HOLY TRINITY, a Texas corporation; and
NEW MOUNT CARMEL FOUNDATION,
INC., a Wyoming corporation,

Defendants.

Civil Doc. No. 20-CV-215-SWS

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendants Trinity Teen Solutions, Angela Woodward, Jerry Woodward, Kyle Woodward, Kara Woodward, and Dally-Up, LLC (TTS, the Woodwards, and Dally-Up), through undersigned counsel, and pursuant to Local Rule 6.1(e) respectfully submit this Unopposed Motion for Extension of Time to Respond to the Complaint, up through and including January 18, 2021, and advises the Court as follows:

1. Undersigned counsel has conferred with the plaintiffs' counsel regarding the requested relief. Plaintiffs do not oppose.
2. This is the first extension requested by Defendants TTS, the Woodwards, and Dally-Up.
3. Undersigned counsel was recently retained and needs additional time to investigate the complex allegations and claims involving the Trafficking Victims Protection Act (TVPA), the Racketeer Influenced and Corrupt Organizations Act (RICO), and state law negligence set forth in the 109-page Complaint.
4. TTS, the Woodwards, and Dally-Up anticipate needing additional time to confer with Plaintiffs regarding whether Plaintiffs wish to amend the Complaint or brief a motion to dismiss.
5. Based on the foregoing, Defendants TTS, the Woodwards, and Dally-Up request an extension of time up to and including January 18, 2021 to respond to the Complaint.

6. No party will be prejudiced by the relief requested herein.

WHEREFORE Defendants TTS, the Woodwards, and Dally-Up respectfully request that this Court grant an extension of time, through January 18, 2021, to respond to the Complaint. A proposed form of Order is provided for the convenience and consideration of the Court.

Respectfully submitted this 18th day of December, 2020.

GORDON REES SCULLY MANSUKHANI, LLP

/s/ Thomas B. Quinn

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 18th day of December 2020, a true and correct image of the foregoing was e-filed via CM/ECF and served to all attorneys of record:

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